

Rule Interpretation Memos for 30 TAC 115, Surface Coating Processes

- ! [Determination of applicability for maintenance painting activities- RETIRED](#)
[June 29, 2000]
- ! [Determination if stenciling on pipe is subject to Surface Coating Process rules](#) [May 1, 1997]
- ! [Determination of requirements for non-exempt solvent washing in 115.421\(a\)\(9\)\(C\)](#)
[May 3, 1999]
- ! [Determination of records needed to define compliance with the limitations in 115.421 \(a\)\(9\) and the exemption in 115.427\(a\)\(3\)\(A\) - Retired](#) [August 10, 2001]
- ! [Applicability of 115.421\(a\)\(9\) to painting of metal components.-RETIRED](#)
[June 29, 2000]
- ! [Determination of the daily weighted average for a single day for §115.421\(a\).](#) [February 12, 1999]
- ! [Applicability of 30 TAC §115.421\(a\)\(11\), if two limits can apply to a given architectural coating - Retired.](#) [July 20, 2000]
- ! [Typographical error in 30 TAC 115.427\(a\)\(3\)\(K\) - Retired](#) [August 10, 2001]

Last Modified: August 10, 2001

**Retired as a result of amendments to Chapter 115 adopted on
June 29, 2000 (Rule Log No. 1999-023-115-A1)**

Last Modified; June 29, 2000

Rule Interpretation Summary Form

Determination if stenciling on pipe is subject to Surface Coating Process rules	CODE #: R5-421.002
May 1, 1997	

REQUEST:

Rule/Regulation Citation(s):	Federal Rule: <input type="checkbox"/> State Regulation: <input checked="" type="checkbox"/>
30 TAC 115, §§115.421-429	Description: Subchapter E: <i>Solvent-Using Process Surface Coating Processes</i>
Interpretation Request:	
External customer wants to know if the Surface Coating Processes rules stated in 30 TAC Chapter 115 apply to stenciling operations.	

DETERMINATION:

Summary of Request:
External customer wants to know if the Surface Coating Processes rules of §§115.421-429 apply to his stenciling operation. The customer has an internal pipe coating facility. After the pipe is coated on the inside diameter, in a separate operation, the outside of the pipe is stenciled. The stenciling operation is used to identify the coated pipe part number, coating type, lot and batch number. The information stenciled on the outside of the pipe is used for inventory control and traceability purposes to track field failures.
Determination:
The Rule Interpretation Team (RIT) has determined the external customer’s “stenciling” of part number identification, type, lot and/or batch numbers of their internal coatings on the pipe is for functional purposes and is subject to Surface Coating Processes rules §§115.421-429. The RIT has determined that since “stenciling” serves a functional purpose, it meets the definition of coating as defined in §115.10. Therefore, “stenciling” is subject to Surface Coating Processes rules of §§115.421-429.

Air Rule Interpretation Summary Form

Code Number	R5-421.003
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May 3, 1999

Rule/Regulation Citation(s):	Federal Rule: <input type="checkbox"/> State Regulation: <input checked="" type="checkbox"/>
30 Tex. Admin. Code Chapter 115, §§ 115.421 - .429	Description: Subchapter E: Solvent-Using Processes Division 2: Surface Coating Processes
Interpretation Request:	
Determine the requirements of Title 30 Texas Administrative Code (Tex. Admin. Code) § 115.421(a)(9)(C), regarding the meaning of non-exempt solvent washing which are directed into containers that prevent evaporation into the atmosphere. Examples of compliant practices that avoid the need to add these solvents to the emission limitation calculation should be included. (Note: “Exempt solvent” is defined in 30 Tex. Admin. Code § 101.1 as “Those carbon compounds or mixtures of carbon compounds used as solvents which have been excluded from the definition of volatile organic compound.”)	
Determination:	

If the emissions from the solvent washing are not controlled, they must be included in the determination of compliance. However, if the solvent washing, prior to or after painting, is directed into an essentially closed container then the resulting emissions are not required to be included in the determination of compliance with the emission limitation listed in 30 Tex. Admin. Code § 115.421(a)(9). The following is a list of some examples of compliant practices that avoid the need to add cleanup solvents to the emission limitation calculation:

1. *Using brushes, rags, etc. with non-exempt solvent to clean parts prior to painting or to wash or clean up a coating application system or associated equipment such as spray booth walls.*

When not in use, the brushes, rags, and any used non-exempt solvent, used to clean parts, the coating application system, or associated equipment such as spray booth walls, are placed in a closed container for reuse or proper disposal.

2. *Using non-exempt solvent to wash or clean up a coating application system employing a coating dipping system.*

Once the surplus coating has been removed from the dip tank and properly stored, solvent is used to remove any residual coating. The used solvent is then drained into an air tight container which is sealed until such time that the solvent is reused or disposed of properly.

3. *Using non-exempt solvent to wash and purge a coating application system using spray guns.*

After any surplus coating has been removed from the spray gun and coating reservoir, solvent coated rags are used to clean the exterior of the spray gun/reservoir. The rags are then stored in an air tight container such that they do not create a fire safety hazard, until such time that the contents of the container can be disposed of properly. The spray gun/reservoir is then washed and purged with solvent. While washing and purging the supply lines and spray gun, the spray from the gun must be directed into a container which, when not in use, is capable of being closed air tight. All attempts should be made to limit the amount of solvent that escapes from the container as the spray gun is being purged.

4. *Using non-exempt solvent in a remote reservoir cold solvent cleaner.*

After any surplus coating has been removed from the spray gun and coating reservoir, the outside of the spray gun is washed under running solvent. The solvent drains into the remote solvent reservoir. The coating reservoir is then purged with solvent, with the solvent being directed toward the drain which leads to the remote reservoir.

Bibliography:

Title 30 Tex. Admin. Code, Chapter 115, Subchapter E: Solvent-Using Processes; Division 2: Surface Coating Processes [Effective date: April 7, 1998]

TNRCC Evaluation of Testimony for proposed changes to Chapter 115, adopted on January 8, 1982

TNRCC Evaluation of Testimony for proposed changes to Chapter 115, adopted on July 11, 1980

TNRCC Evaluation of Testimony for proposed changes to Chapter 115, adopted on October 14, 1988

TNRCC Evaluation of Testimony for proposed changes to Chapter 115, adopted on November 10, 1993

Control of Volatile Organic Emissions from Existing Stationary Source - Volume VI: Surface Coating of Miscellaneous Metal Parts and Products, EPA-450/2-78-015, June 1978

Guidance to State and Local Agencies in Preparing Regulations to Control Volatile Organic Compounds from Ten Stationary Source Categories, by Mr. Stephen V. Capone and Mr. Malcolm Petroccia, GCA Corporation,

Prepared for the U.S. Environmental Protection Agency, September 1979

U.S. Environmental Protection Agency Memorandum from Mr. John Rasnic, Director of Manufacturing, Energy and Transportation Division, to Mr. David Kee, Director of Air and Radiation Division, Region 5; Subject: Miscellaneous Metal Parts and Products Regulation Applicability Determination for Recoating/Refurbishing Operations, January 26, 1995.

Please note, in the event that an external customer feels that this rule interpretation is in error or a source of information has been overlooked which would change the determination, a request for reconsideration may be submitted. Requests must be submitted on a Reconsideration Process Form which is available at the TNRCC's homepage: <http://www.tnrcc.state.tx.us/air/opd/rmhmpg.htm>, or from any of the air rule interpretation team members.

[AOPDG95A/11172-v2]

**Retired as a result of amendments to Chapter 115 adopted on
August 8, 2001 (Rule Log No. 2001-005-115-A1; effective date
August 29, 2001)**

Retired as a result of a correction in 30 Texas Administrative Code Chapter 115 rule amendments adopted on 6/29/2000 (Rule log no. 1999-023-115-AI)

Last Modified: June 29, 2000

Rule Interpretation Summary Form

Determination of the daily weighted average for a single day for §115.421(a).	CODE #: R5-421.006
February 12, 1999	

REQUEST:

Rule/Regulation Citation(s):	Federal Rule: <input type="checkbox"/> State Regulation: <input checked="" type="checkbox"/>
30 Tex. Admin. Code, Chapter 115 § 115.421(a)	Description: Subchapter E: Solvent-Using Processes Division 2: Surface Coating Processes
Interpretation Request:	
Title 30 Texas Administrative Code § 115.421(a) [30 Tex. Admin. Code § 115.421(a)] in part states: “These limitations are based on the daily weighted average of all coatings delivered to each coating line,.... For the purposes of this division (relating to Surface Coating Processes), daily weighted average means the total weight of VOC emissions from all coatings, divided by the total volume of all coatings (minus water and exempt solvent) delivered to the application system each day.” For determining the daily weighted average, is it the weighted average of all volatile organic compounds (VOC) constituents in one coating in a single day, or the weighted average of every coating applied in a single day?	

DETERMINATION:

Determination:
Daily weighted average is the total weight of VOC emissions from all coatings subject to the same emission standard in 30 Tex. Admin. Code § 115.421, divided by the total volume of those coatings (minus water and exempt solvent) delivered to the application system each day. Coatings subject to different emission standards in 30 Tex. Admin. Code § 115.421 shall not be combined for purposes of determining the daily weighted average. Furthermore, determination of compliance is also based on each individual coating line.

Bibliography:

21 Tex. Reg. 11,231 (1996) (November 19, 1996)

Title 30 Tex. Admin. Code Chapter 115 (Effective Date: September 20, 1998)

Retired as a result of amendments to Chapter 115 adopted on 6/29/00 (Rule Log No. 1999-023-115-AI; Effective date 7/20/00 which deleted the Chapter 15 architectural coating rules.

Last Modified: July 20, 2000

**Retired as a result of amendments to Chapter 115 adopted on
August 8, 2001 (Rule Log No. 2001-005-115-A1; effective date
August 29, 2001)**